

Cause No. 2012-45104

FLOR DEPAZ

IN THE DISTRICT COURT OF

VS.

HARRIS COUNTY, TEXAS

THE HERTZ CORPORATION AND
KAYALVIZHI NADANAM

§ 125TH JUDICIAL DISTRICT

DEFENDANT, THE HERTZ CORPORATION'S
ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

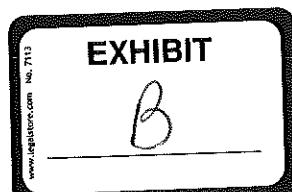
COME NOW, THE HERTZ CORPORATION, Defendant in the above-numbered cause of action, and files its Original Answer to the Petition filed by Plaintiff, FLOR DEPAZ, and would respectfully show this Honorable Court as follows:

I.
GENERAL DENIAL

Subject to such stipulations as may hereafter be made, Defendant asserts a general denial as is authorized by Rule 92 of the TEXAS RULES OF CIVIL PROCEDURE, and Defendant respectfully requests that Plaintiff be required to prove the charges and allegations against the Defendant by a preponderance of the evidence as is required by the Constitution and laws of the State of Texas. Defendant further reserves the right to amend this Answer at a future date in accordance with the TEXAS RULES OF CIVIL PROCEDURE.

PRAYER

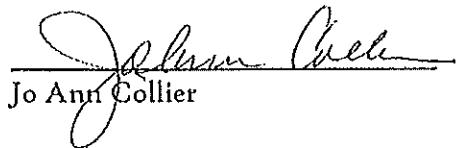
WHEREFORE, PREMISES CONSIDERED, Defendant, THE HERTZ CORPORATION, prays that Plaintiff take nothing by this suit against Defendant, and further prays for such other and further relief, both general and special, at law and in equity, to which Defendant may be justly entitled.



CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of August, 2012, a true and correct copy of the foregoing, *Request for Jury Trial*, was duly served via facsimile and/or certified mail, return receipt requested in accordance with the Texas Rules of Civil Procedure.

Thomas P. Nixon
Law offices of Thomas P. Nixon, P.C.
6009 Richmond Avenue, Suite 208
Houston, Texas 77057
Attorneys for Plaintiff
(Via Facsimile Delivery: 888.591.5924)



Jo Ann Collier

Cause No. 2012-45104

FLOR DEPAZ

§ IN THE DISTRICT COURT OF
§ HARRIS COUNTY, TEXAS
§
§ 125TH JUDICIAL DISTRICT

VS.
THE HERTZ CORPORATION AND
KAYALVIZHI NADANAM

REQUEST FOR JURY TRIAL

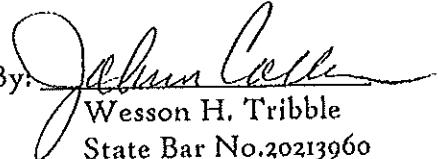
TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendant **THE HERTZ CORPORATION**, and requests that a jury trial be held on said cause. Defendant hereby tenders a jury fee in the sum of \$30.00 to the Harris County District Clerk's office.

Respectfully submitted,

TRIBBLE, ROSS & WAGNER

By:



Wesson H. Tribble

State Bar No. 20213960

Jo Ann Collier

State Bar No. 04595300

3355 West Alabama, Suite 1200

Houston, Texas 77098

Telephone: 713.622.0444

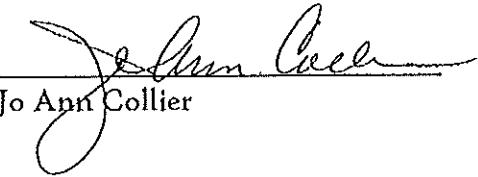
Facsimile: 713.622.0555

ATTORNEYS FOR DEFENDANTS,
THE HERTZ CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of August, 2012, a true and correct copy of the foregoing, *Request for Jury Trial*, was duly served via facsimile and/or certified mail, return receipt requested in accordance with the Texas Rules of Civil Procedure.

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6009 Richmond Avenue, Suite 208
Houston, Texas 77057
Attorneys for Plaintiff
(Via Facsimile Delivery: 888.591.5924)



Jo Ann Collier

Cause No. 2012-45104

FLOR DEPAZ § IN THE DISTRICT COURT OF
§ HARRIS COUNTY, TEXAS
VS. §
THE HERTZ CORPORATION AND § 125TH JUDICIAL DISTRICT
KAYALVIZHI NADANAM §

**DEFENDANT, KAYALVIZHI NADANAM'S
ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, KAYALVIZHI NADANAM , Defendant in the above-numbered cause of action, and files its Original Answer to the Petition filed by Plaintiff, FLOR DEPAZ, and would respectfully show this Honorable Court as follows:

**I.
GENERAL DENIAL**

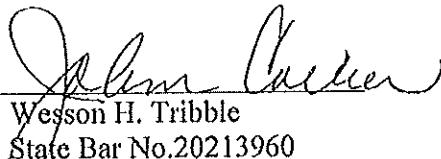
Subject to such stipulations as may hereafter be made, Defendant asserts a general denial as is authorized by Rule 92 of the TEXAS RULES OF CIVIL PROCEDURE, and Defendant respectfully requests that Plaintiff be required to prove the charges and allegations against the Defendant by a preponderance of the evidence as is required by the Constitution and laws of the State of Texas. Defendant further reserves the right to amend this Answer at a future date in accordance with the TEXAS RULES OF CIVIL PROCEDURE.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant, KAYALVIZHI NADANAM, prays that Plaintiff take nothing by this suit against Defendant, and further prays for such other and further relief, both general and special, at law and in equity, to which Defendant may be justly entitled.

Respectfully submitted,

TRIBBLE, ROSS & WAGNER

By: 

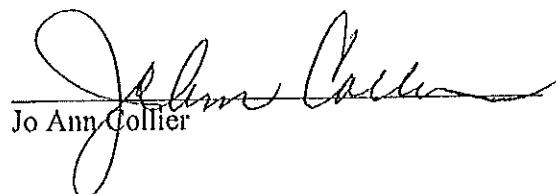
Wesson H. Tribble
State Bar No.20213960
Jo Ann Collier
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Houston, Texas 77098
Telephone: 713.622.0444
Facsimile: 713.622.0555

**ATTORNEYS FOR DEFENDANTS,
THE HERTZ CORPORATION AND
KAUALVIZHI NADANAM**

CERTIFICATE OF SERVICE

I hereby certify that on this the 5th day of September, 2012, a true and correct copy of the foregoing, *Defendant, Kayalvizhi Nadanam's Original Answer*, was duly served via facsimile and/or certified mail, return receipt requested in accordance with the Texas Rules of Civil Procedure.

Thomas P. Nixon
Law offices of Thomas P. Nixon, P.C.
6009 Richmond Avenue, Suite 208
Houston, Texas 77057
Attorneys for Plaintiff
(Via Facsimile Delivery: 888.591.5924)


Jo Ann Collier

Cause No. 2012-45104

FLOR DEPAZ § IN THE DISTRICT COURT OF
VS. § HARRIS COUNTY, TEXAS
THE HERTZ CORPORATION AND § § 125TH JUDICIAL DISTRICT
KAYALVIZHI NADANAM §

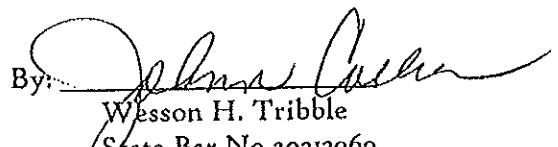
REQUEST FOR JURY TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant KAYALVIZHI NADANAM, and requests that a jury trial be held on said cause. Defendant hereby tenders a jury fee in the sum of \$30.00 to the Harris County District Clerk's office.

Respectfully submitted,

TRIBBLE, ROSS & WAGNER

By: 

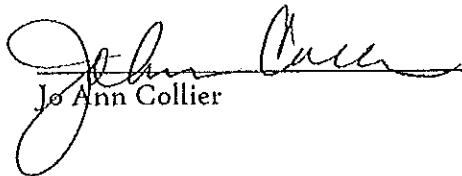
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Houston, Texas 77098
Telephone: 713.622.0444
Facsimile: 713.622.0555

ATTORNEYS FOR DEFENDANTS,
THE HERTZ CORPORATION AND
KAYALVIZHI NADANAM

CERTIFICATE OF SERVICE

I hereby certify that on this the 5th day of September, 2012, a true and correct copy of the foregoing, *Request for Jury Trial*, was duly served via facsimile and/or certified mail, return receipt requested in accordance with the Texas Rules of Civil Procedure.

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Attorneys for Plaintiff
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Jo Ann Collier